

January 15, 2004

**BY HAND DELIVERY**

Mr. John Muleta  
Chief, Wireless Telecommunications Bureau  
and  
Mr. David Solomon  
Chief, Enforcement Bureau  
Federal Communications Commission  
445 12<sup>th</sup> St. SW  
Washington, DC 20554

Re: Interim Report for Tier III Carriers  
Corr Wireless Communications, LLC

Dear Sirs:

This letter constitutes the "Interim Report" required of Tier III carriers by the *Order to Stay*, released October 10, 2003. Corr Wireless Communications, LLC ("Corr"), is one of the carriers referenced in the Appendices of that *Order*. This report follows the format suggested by the "Further Guidance" *Public Notice* released on June 30, 2003.

As Corr reported in its initial Interim Report in August 2003, its ability to implement Phase II was adversely impacted by the vacillation of Tier I carriers in adopting technical solutions. As recently as last winter, Corr envisioned using a hybrid handset-network solution under an equipment proposal propounded by one of the major equipment vendors. However, when the Tier I carriers who were the major prospective purchasers of that system backed out, the economies of scale necessary to make that system available to other carriers disappeared. Thus, Corr suddenly found itself without a handset-based system less than eight months before the September 1 deadline. It then had to quickly re-evaluate network-based solutions, negotiate with manufacturers, and develop a plan to get a system installed in time.

Corr filed a request for a very brief waiver of the timing of the Phase II compliance schedule on August 22, 2003. At that time it appeared that last-minute complications in the installation of its Grayson

network-based Phase II solution would delay implementation for about three to four weeks. As reported in Supplements filed on October 15, November 17, and December 16, Corr was able to complete installation of the Phase II system (with various unanticipated software patches and equipment add-ons) throughout its TDMA network by mid-December, 2003. The system is now fully operational. Installation and integration of the Phase II solution into Corr's new GSM overlay network is proceeding apace and that should also be completed shortly. Corr has been working with the equipment vendor for the last three weeks to fine-tune the system in order to verify compliance with the accuracy guidelines specified by the rules. As of January 14, the vendor has declared the system ready for commercial application.

The specifics of PSAP requests and Corr's Phase II solution are set out below:

1. Outstanding Phase I and II PSAP Requests:

Corr has received Phase I requests from the following municipalities/counties in Alabama:

Athens/Limestone County  
Blount County  
Cullman County  
Etowah County  
Huntsville/Madison County  
Morgan County

Phase I service is being provided in each of these jurisdictions, as well as Marshall County, AL. Corr has also received PSAP requests for Phase I service in the following counties/city where it does not provide TDMA CMRS service:

Cleburne County  
Calhoun County  
Autauga County  
Dallas County  
St. Clair County  
Russell County  
Sumter County  
City of Irondale

Corr has received Phase II requests from Limestone, Madison, Morgan, Cullman and Etowah counties in Alabama.

2. Technology choice:

As noted above, Corr considered various alternative solutions to the 911 problem. As a TDMA carrier, its options in the handset area were non-existent. It decided to install a GSM overlay, in part to enable it to take advantage of the handset technology which we expected to be available. As it turned out, the major proponent of GSM handset solutions effectively abandoned the effort and Corr had to return to the far more costly network solution. Specifically, Corr has purchased and installed a Grayson Wireless Phase II system.

3. Status of ordering and installing equipment:

Phase II service is being provided in all TDMA counties for which a PSAP request for such service has been received. As the GSM overlay is brought on-line, Phase II service will also be provided in those areas where GSM is available and where PSAP requests have been received.

Please contact the undersigned should you require further particulars about Corr's provision of E-911 service.

Yours very truly,

Donald J. Evans  
Counsel for  
Corr Wireless Communications, LLC

DJE:deb

cc: Bryan Corr

### CERTIFICATION OF ACCURACY

I, Bryan Corr, President of the sole member of Corr Wireless Communications, LLC, hereby declare under penalty of perjury that the attached Interim Report for Tier III Carriers is true and correct to the best of my knowledge and belief.

\_\_\_\_\_/s/\_\_\_\_\_  
January 15, 2004